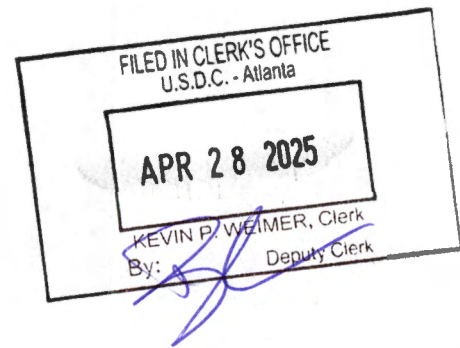


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

NATALIE SOTO,
Plaintiff,

v.
WENDELL HOLMES JR.
Defendant.

Civil Action No. 1:24-cv-02911.



1. DEFENDANT'S STATEMENT OF UNDISPUTED MATERIAL FACTS (LR 56.1)

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Civil Action No. 1:24-cv-02911-SDG

DEFENDANT'S STATEMENT OF UNDISPUTED MATERIAL FACTS

Pursuant to Local Rule 56.1, Defendant Wendell Holmes, Jr., pro se, submits the following Statement of Undisputed Material Facts in support of his Motion for Summary Judgment. Each fact is supported by specific citation to the Declaration of Wendell Holmes, Jr. and attached Exhibits A–D.

1. On April 17, 2024, Plaintiff Natalie Soto caused a criminal complaint for invasion of privacy to be filed against Defendant in Cobb County, Georgia. (Declaration of Wendell Holmes, Jr. ("Decl.") 4.)
2. Defendant was ministering in music on a church livestream on Father's Day, June 16, 2024, when law-enforcement officers executed a warrant for his arrest. (Decl. 5; Ex. A, Church Livestream Screenshot.)

3. Plaintiff provided no affidavits, documents, or other evidence to law enforcement to establish probable cause for the arrest. (Decl. 6.)
4. Plaintiff contacted Defendant's family and employer in a retaliatory manner, resulting in his public arrest and termination from his position at the church. (Decl. 7.)
5. Defendant privately sent nude photograph of Plaintiff to non-party Dawn Douglas on or around February 23, 2024, solely to induce her to ask Plaintiff to remove a defamatory Facebook post. (Decl. 3.)
6. Plaintiff never produced any evidence of lost wages, medical or mental-health treatment, or reputational harm resulting from Defendant's conduct. (Decl. 8.)
7. After Defendant filed summary-judgment motions, Plaintiff deleted or made private all of her social-media accounts, including Facebook, TikTok, and Instagram. (Decl. 9.)
8. Defendant preserved video recordings of Plaintiff's pre-deletion social-media posts showing her bragging about a new job, pole-dancing classes, and vacations with a romantic partner. (Decl. 10; Ex. B, Social Media Videos.)
9. Defendant was terminated from his church employment on June 17, 2024, as a direct result of his Father's Day arrest. (Decl. 11; Ex. C, Termination Email.)
10. No conviction has occurred; the criminal case remains pending with no judicial finding of guilt or probable cause. (Decl. 12.)

2. EXHIBIT LIST

- Exhibit A: Screenshot of church livestream on June 16, 2024, showing Defendant ministering in music when officers arrived.
- Exhibit B: Video excerpts of Plaintiff's Facebook and Instagram posts (pre-deletion) showing her new job, pole-dancing classes, and vacations.
- Exhibit C: Email from Pleasant Grove Missionary Baptist Church terminating Defendant's employment on June 17, 2024.
- Exhibit D: Defendant's financial record showing lost wages following termination.

3. NOTICE OF FILING

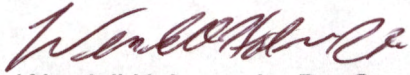
DEFENDANT'S NOTICE OF FILING LR 56.1 STATEMENT AND EXHIBITS

Defendant Wendell Holmes, Jr., pro se, hereby gives notice that on April 28th, 2025, he filed:

- 1. Defendant's Statement of Undisputed Material Facts (LR 56.1); and**
- 2. Exhibits A–D in support of his Motion for Summary Judgment [Doc. 57].**

These documents cure the procedural deficiencies noted in Plaintiff's Response in Opposition [Doc. 63].

Respectfully submitted this 28th day of April, 2025.

A handwritten signature in red ink, appearing to read "Wendell Holmes, Jr.", is positioned above the typed name.

**Wendell Holmes, Jr., Pro Se
5934 Rosie Lane, SE
Mableton, GA 30126
wendellholmesjr@gmail.com**

UNITED STATES DISTRICT COURT
for the
Northern District of Georgia
Atlanta Division

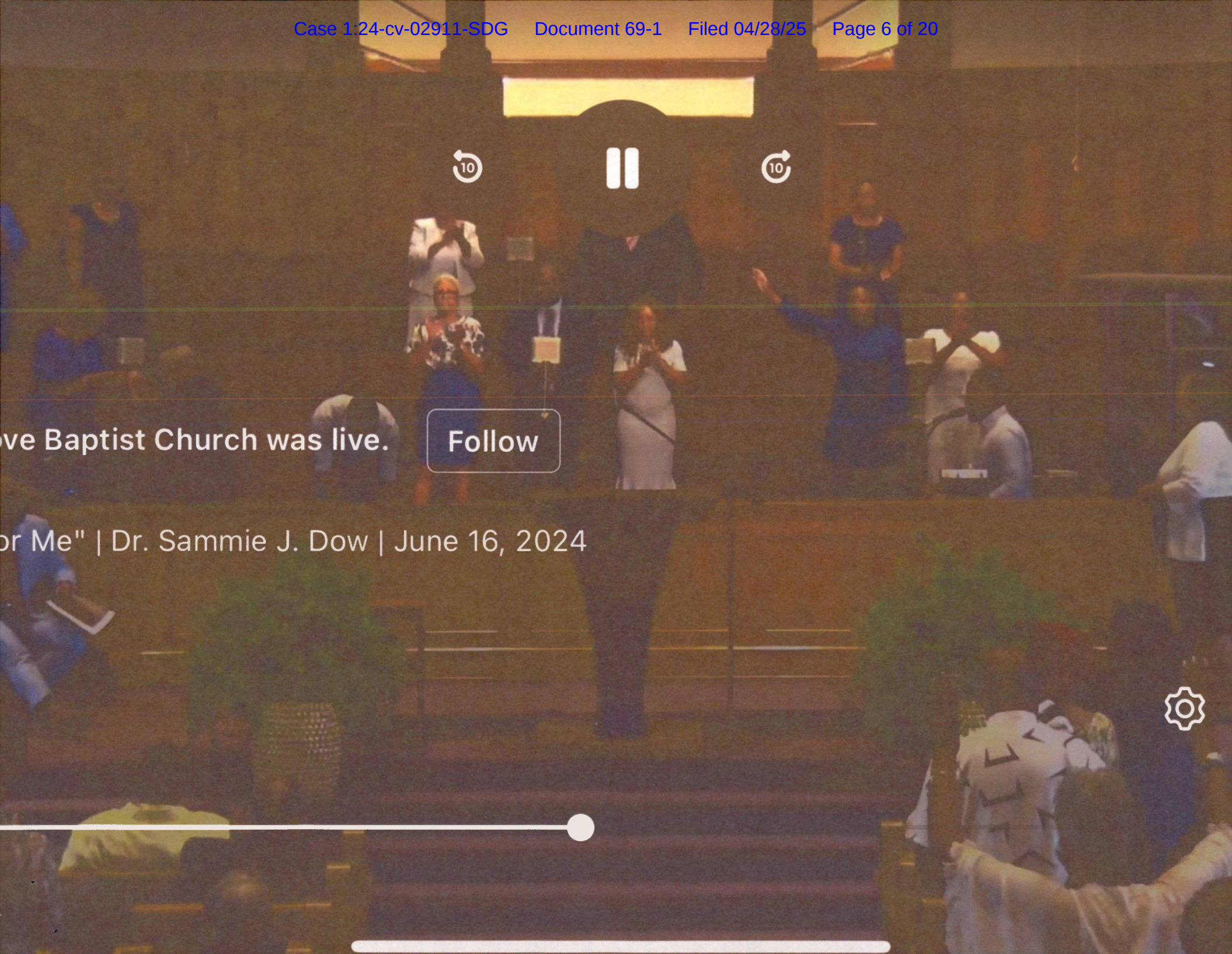
Natalie Soto
Plaintiff,

v.

Case Number: 1:24-cv-02911-SDG

Wendell Holmes Jr.
Defendant.

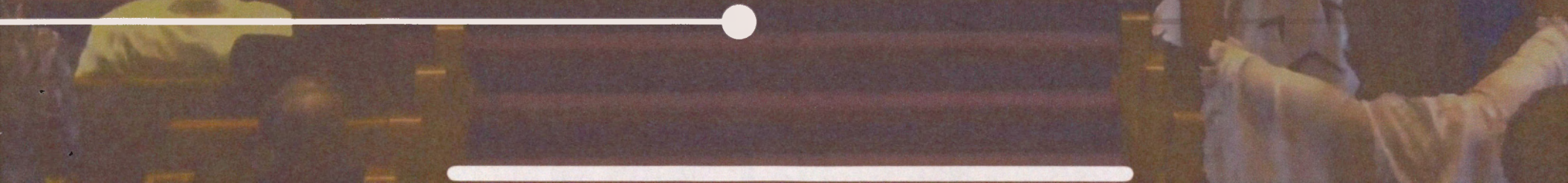
Exhibit A

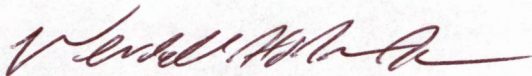


ve Baptist Church was live.

Follow

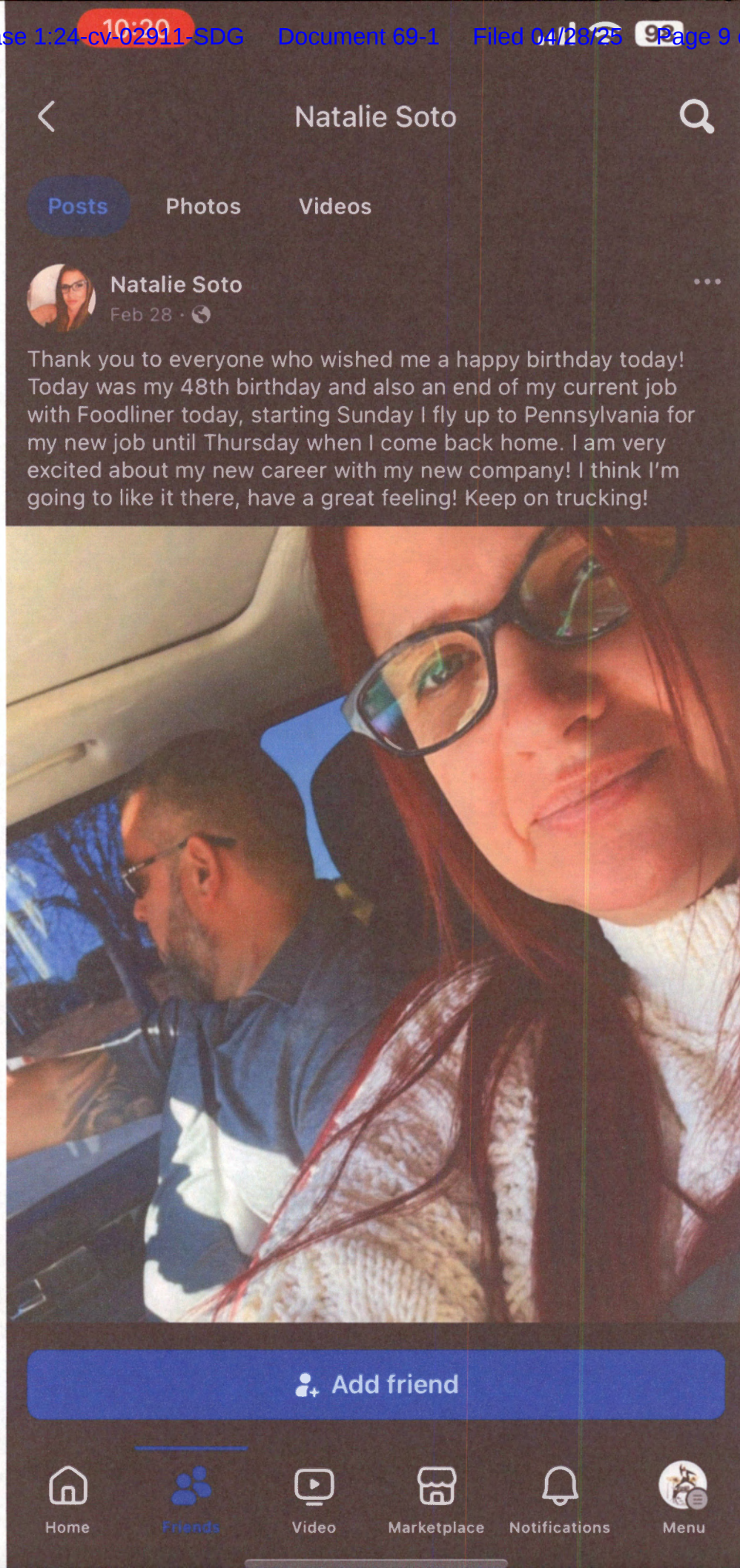
or Me" | Dr. Sammie J. Dow | June 16, 2024

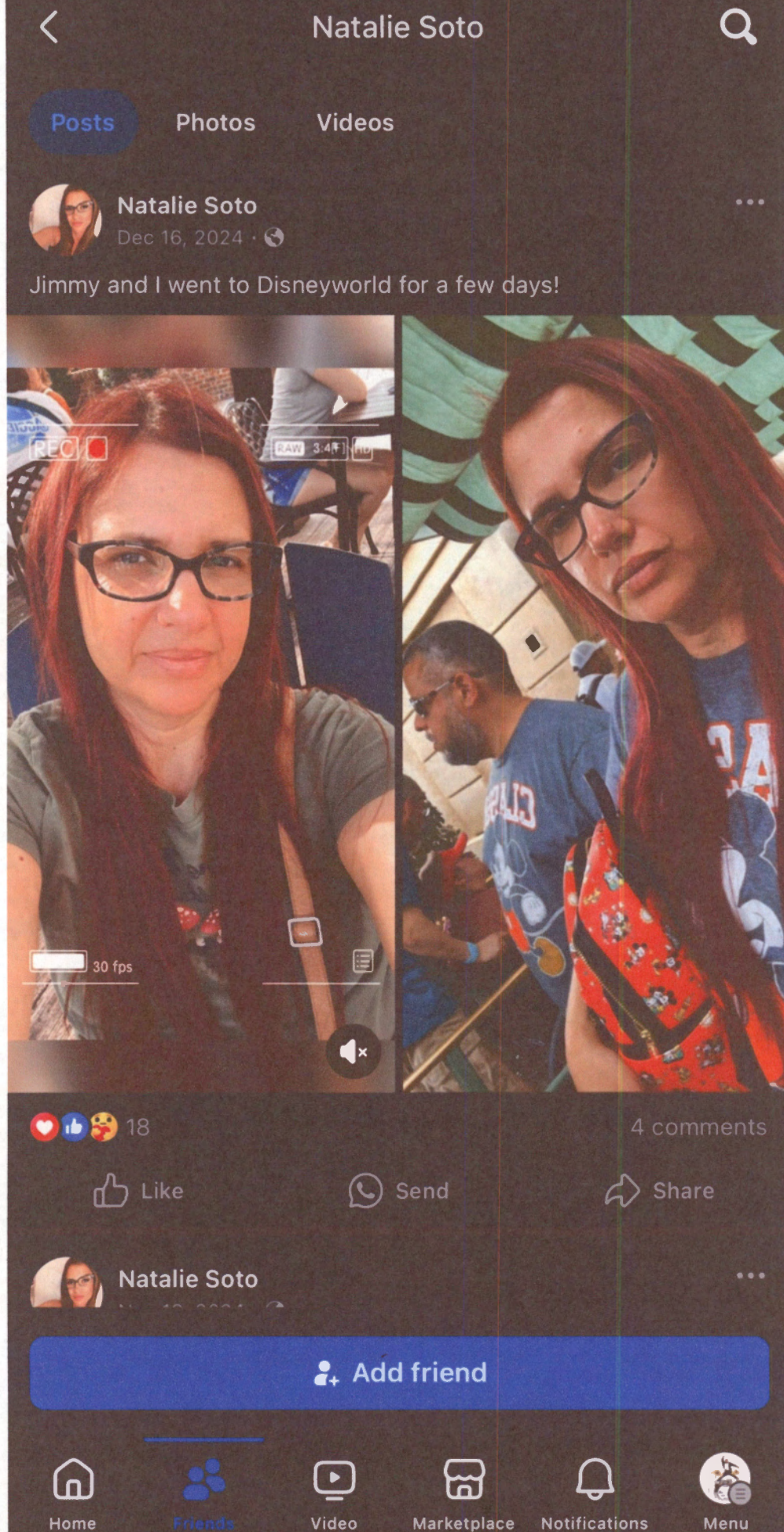


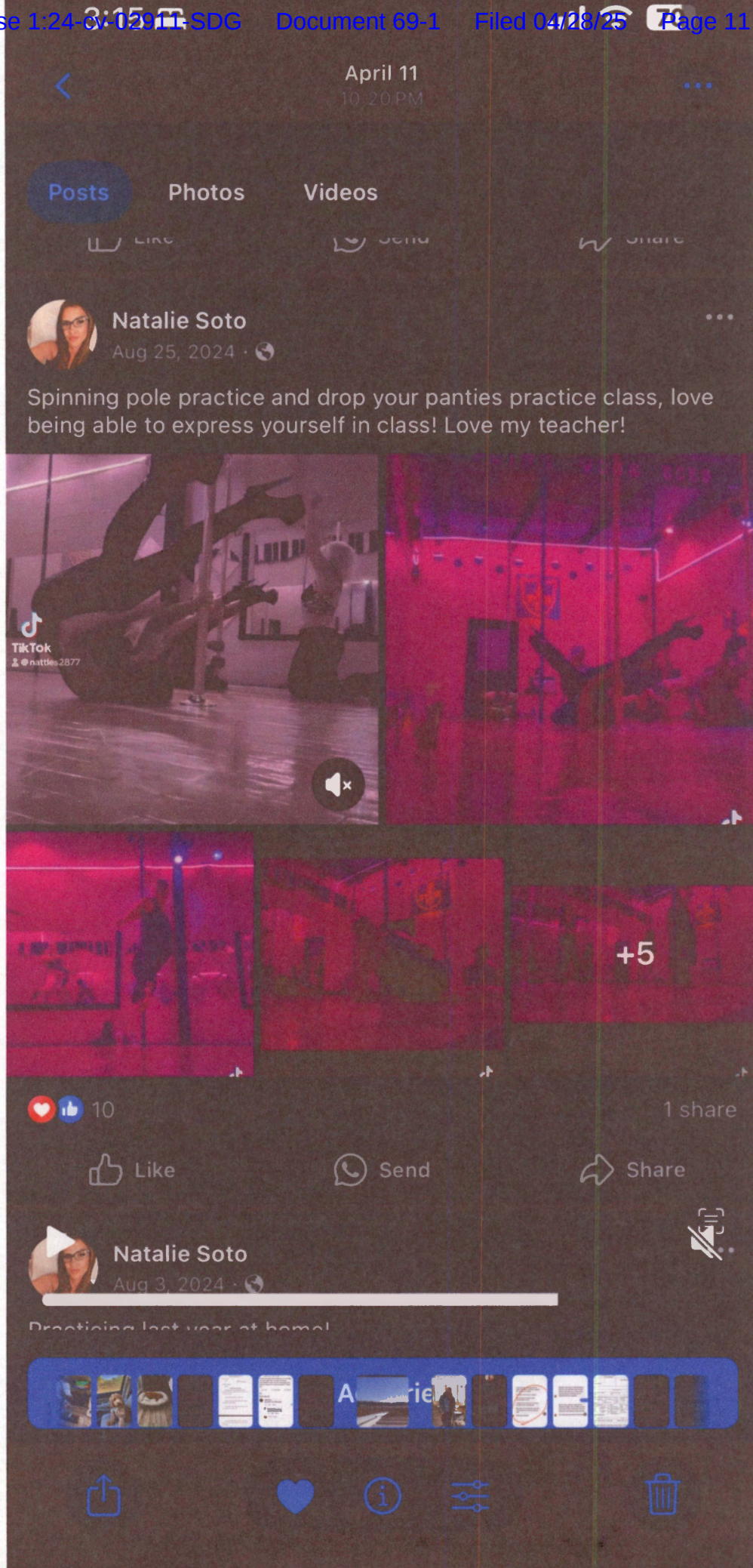
A handwritten signature in dark ink, appearing to read "Wendell Holmes, Jr.", with a stylized, cursive script.

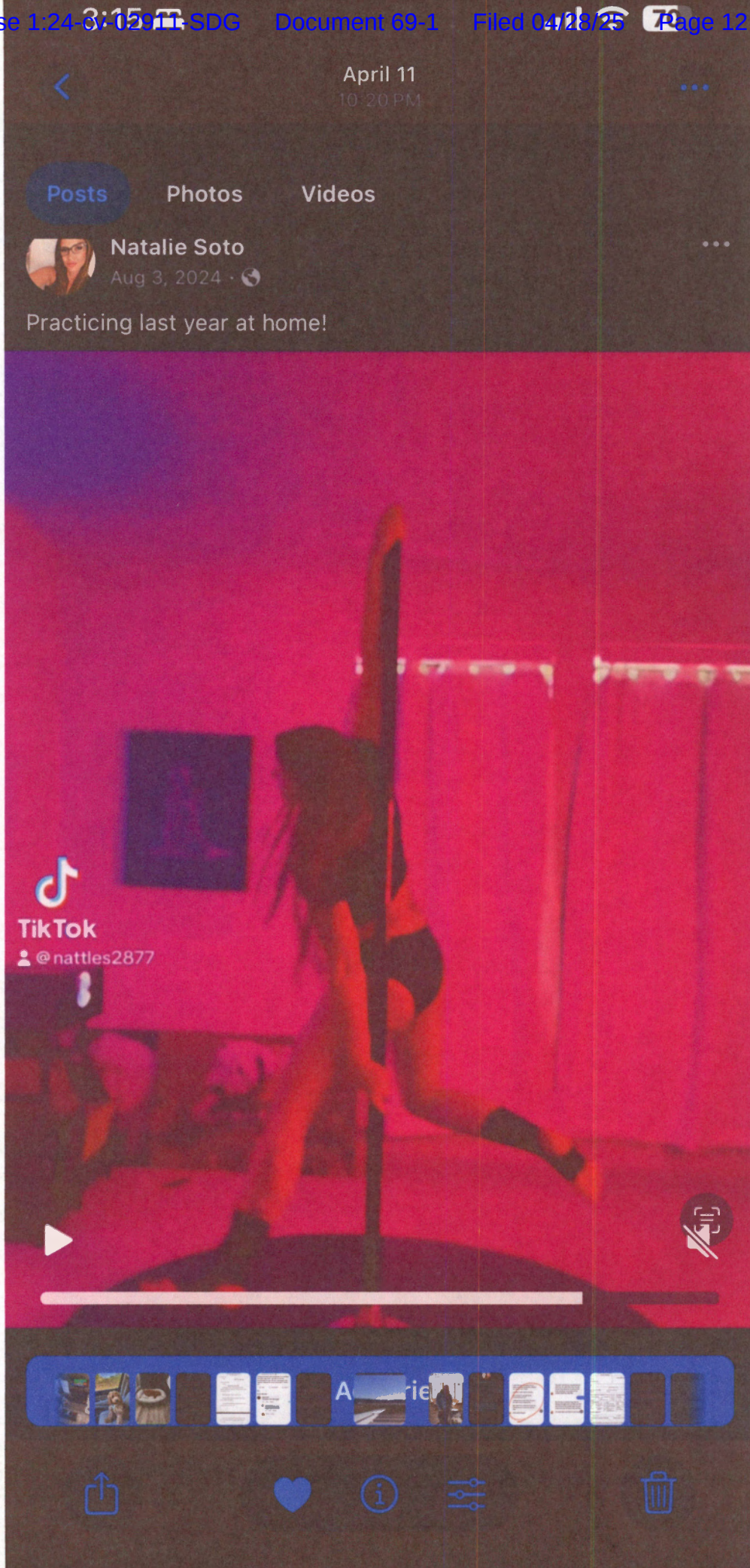
Wendell Holmes, Jr., Pro Se
5934 Rosie Lane, SE
Mableton, GA 30126
wendellholmesjr@gmail.com

Exhibit B









< Natalie Soto



Posts

Photos

Videos

Like

Share



Natalie Soto



5d · 🌐

There's nothing more sexier than a woman banging a trailer! (aka- the sugar momma)



Now where did I put my dang hammer 🔨



9

20 comments

Like

Share



Natalie Soto



Mar 7 · 🌐

Flew up on Sunday to Philadelphia to start my new job at HR Ewell, had a wonderful time! Came home yesterday and when I was leaving headquarters there was a beautiful rainbow that appeared! Have a great feeling about this decision to start here! Keep on trucking!

+ Add friend

Message



Home



Video



Friends



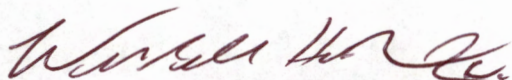
Marketplace



Notifications



Menu

A handwritten signature in dark ink, appearing to read "Wendell Holmes, Jr.", is positioned above the printed contact information.

Wendell Holmes, Jr., Pro Se
5934 Rosie Lane, SE
Mableton, GA 30126
wendellholmesjr@gmail.com

Exhibit C

10:06 PM
8 Messages
Back Sunday June 16, 2024



Elaine Redmond

6/17/24

To: Wendell Cc: Harry, Celia, Rodney & 4 more... >

Good Evening Wendell,

In light of yesterday's unfortunate series of events during your contracted work hours at Pleasant Grove Missionary Baptist Church located at 566 Whitlock Avenue NW, Marietta, Georgia, 30064, we are moving to dissolve your services with us as an independent contractor playing drums for our worship services. Your last day of contracted employment will be dated as of yesterday, June 16, 2024. The check you received on yesterday is your compensation for the date referenced above. As such, we do not owe you any further compensation for services rendered.

Additionally, it has come to our attention that you still have personal property inside the church. I am told it is a book bag and a set of keys. We will have all personal items shipped to the address we have on file for you via overnight shipping.

Thank you for your cooperation in this matter.

Respectfully,

Elaine Redmond

Trustees Ministry Chair on behalf of the Trustee Ministry at Pleasant Grove Missionary Baptist Church



New Message

A handwritten signature in dark ink, appearing to read 'Wendell Holmes, Jr.', with a stylized, cursive script.

Wendell Holmes, Jr., Pro Se
5934 Rosie Lane, SE
Mableton, GA 30126
wendellholmesjr@gmail.com

Exhibit D

1290

2024

Case 1:24-cv-02911-SDG Document 69-1 Filed 04/28/25 Page 19 of 20

1 Nonemployee compensation		12725.00
2 Payer made direct sales totaling \$5,000 or more of consumer products to recipient for resale <input type="checkbox"/>		
3		
4 Federal income tax withheld		
5 State tax withheld		
6 State/Payer's state no. GA/0704394-KJ	7 State income	
1099-NEC Nonemployee Compensation Copy 2 — To be filed with Recipient's State Tax Return (Rev. 1-2024) Dept. of Treasury — IRS <input type="checkbox"/> CORRECTED OMB No. 1545-0116		

1290

2024

1 Nonemployee compensation		12725.00
2 Payer made direct sales totaling \$5,000 or more of consumer products to recipient for resale <input type="checkbox"/>		
3		
4 Federal income tax withheld		
5 State tax withheld		
6 State/Payer's state no. GA/0704394-KJ	7 State income	
1099-NEC Nonemployee Compensation Copy 2 — To be filed with Recipient's State Tax Return (Rev. 1-2024) Dept. of Treasury — IRS <input type="checkbox"/> CORRECTED OMB No. 1545-0116		

PAYER'S name, address, ZIP/postal code, country & phone no.
PLEASANT GROVE MISS BAPT CHURCH
566 WHITLOCK AVENUE NW
MARIETTA GA 30064
(770) 428-3681

PAYER'S TIN 58-1887205	RECIPIENT'S TIN XXX-XX-0078
---------------------------	--------------------------------

RECIPIENT'S name, address, ZIP/postal code & country
WENDELL HOLMES
5934 ROSIE LN SE
MABLETON GA 30126

Account number 1290	For calendar year 2024
------------------------	---------------------------

1 Nonemployee compensation	12725.00
----------------------------	----------

2 Payer made direct sales totaling \$5,000 or more of consumer products to recipient for resale <input type="checkbox"/>
--

3

4 Federal income tax withheld

This is important tax information and is being furnished to the IRS. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if this income is taxable and the IRS determines that it has not been reported.

Instructions for Recipient

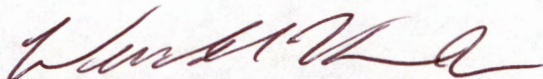
You received this form instead of Form W-2 because the payer did not consider you an employee and did not withhold income tax or social security and Medicare tax.

If you believe you are an employee and cannot get the payer to correct this form, report the amount shown in box 1 on the line for "Wages, salaries, tips, etc." of Form 1040, 1040-SR, or 1040-NR. You must also complete Form 8919 and attach it to your return. For more information, see Pub. 1779, Independent Contractor or Employee.

If you are not an employee but the amount in box 1 is not self-employment (SE) income (for example, it is income from a sporadic activity or a hobby), report the amount shown in box 1 on the "Other income" line (on Schedule 1 (Form 1040)).

Recipient's taxpayer identification number (TIN).

For your protection, this form may show only the last four digits of your TIN (social security number (SSN), individual taxpayer identification number (ITIN),

A handwritten signature in dark ink, appearing to read 'Wendell Holmes, Jr.', with a stylized, cursive script.

Wendell Holmes, Jr., Pro Se
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